

# EXHIBIT “C”

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND )  
COMPOUNDING PHARMACY, ) MDL No. 2419  
INC. PRODUCTS LIABILITY ) Master Docket No.:  
LITIGATION ) 1:13-md-2419-RWZ  
)  
THIS DOCUMENT RELATES TO: ) Honorable Rya W. Zobel  
All Actions )  
\_\_\_\_\_ )

VIDEOTAPED DEPOSITION OF:

GREGORY B. LANFORD, M.D.

Taken on behalf of the Plaintiffs

September 18, 2015

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1 Q. So in order to get an epidural steroid  
2 injection at STOPNC, you must be referred by a Howell  
3 Allen physician?

4 A. Yes.

5 Q. Why is that?

6 A. It's part of our practice, and it's the way the  
7 center is licensed. We have a CON. That's the way it's  
8 licensed, and that's the way it's been since it opened.

9 Q. Can physicians affiliated with Saint Thomas  
10 Hospital refer patients to STOPNC?

11 A. If they're patients of Howell Allen.

12 Q. So if a patient sees a physician at  
13 Saint Thomas Hospital and they want to get an epidural  
14 steroid injection, they have to first be referred to  
15 Howell Allen, and then Howell Allen can refer them to  
16 STOPNC?

17 A. It's possible it could occur that way, but  
18 also, if a physician has a patient in the hospital that  
19 needs an epidural steroid injection, it's more likely it  
20 would just be performed at the hospital.

21 Q. At some point, there was a discussion between  
22 Saint Thomas and Howell Allen Clinic about Howell Allen  
23 physicians serving -- or entering into an on-call  
24 arrangement; is that right?

25 A. Yes.